

Civil Action

ROBERT CHILDERS; COUNTRYWIDE :  
HOME LOANS SERVICING LP, PHELAN :  
HALLINAN & SCHMIEG , PC :  
:  
Third Party Defendants on :  
the Second Amended :  
Third Party Complaint :

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**TO: CHIEF JUDGE AND JUDGES OF THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY**

**PLEASE TAKE NOTICE** that on May 18, 2009, at 9 o'clock in the forenoon or as soon thereafter as counsel may be heard, the undersigned, South Jersey Legal Services, Inc., Attorneys for Defendant(s)/Third Party Plaintiff(s), through counsel Abigail B. Sullivan, Esq., shall move before the United States District Court for the District of New Jersey, for an order remanding the Plaintiff's Complaint to the State Court pursuant to 28 U.S.C. §1441 (c).

**PLEASE TAKE FURTHER NOTICE** that in support of this application, Defendant(s), Third Party Plaintiff(s) shall rely upon the annexed Brief in Support of Defendant(s) Motion for Remand and Certification of Abigail B. Sullivan, Esquire.

**PLEASE TAKE FURTHER NOTICE** that an original and three (3) copies of the proposed order are attached hereto.

**PLEASE TAKE FURTHER NOTICE** that oral argument is requested in the event that opposition to this motion is filed.

South Jersey Legal Services, Inc.  
745 Market Street  
Camden, New Jersey 08102  
(856)964-2010 Ext. 6907

/s/Abigail B. Sullivan, Esquire  
BY: Abigail B. Sullivan, Esquire  
Attorney for Defendant/Third Party Plaintiff(s)

Dated: April 24, 2009

Of counsel:  
James F. Villere, Jr., Esq.  
Mark J. Malone, Esq.  
Erica B. Askin, Esq.  
LAW OFFICE OF JAMES F. VILLERE, JR.  
441 Main Street  
Metuchen, New Jersey 08840  
(973) 267-0787